

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
	:	

**TRIAL EXHIBIT LIST OF DEFENDANT UNIVERSAL PROTECTION
SERVICE, LP d/b/a ALLIED UNIVERSAL SECURITY SERVICES**

No.	DESCRIPTION	OFFER	OBJ	DATE	
				ADMIT	N/ADM
1.	Incident Reporting and Response				
	<i>[AUS 00983; AUS 00824]</i>				
2.	Inspection Report by Chameleon Associates				
	<i>[AUS 00731 - AUS 00732]</i>				
3.	Poster - Avoid Using Force				
	<i>[AUS 00958]</i>				
4.	TMO Pocket Training Guide HEB				
	<i>[AUS 00956]</i>				
5.	HEB Elite Team Mandatory Training				
	<i>[AUS 00921]</i>				
6.	Firearms, Less Lethal Weapons, Defensive Tactics and Equipment Policy; Use of Force				

	Policy Acknowledgement Form				
	<i>[AUS 00938 - AUS 00989]</i>				
7.	Firearms, Less Lethal Weapons, Defensive Tactics and Equipment Policy; Armed Officer Certification and Acknowledgment Form				
	<i>[AUS 00922 - 00927]</i>				
8.	Disciplinary Matrix Guidelines				
	<i>[AUS 00743 - AUS 00746]</i>				
9.	Legal - Use of Force and Reporting Policy				
	<i>[AUS 00734 - AUS 00742]</i>				
10.	2023 Ahmed's Form 1099				
	<i>[AhmedAllied 000658]</i>				
11.	2022 Ahmed's Form 1099				
	<i>[AhmedAllied 000492]</i>				
12.	2021 Ahmed's W-2 AUS				
	<i>[AhmedAllied 000656]</i>				
13.	Ahmed's Earnings Statement with Western Eagle Security (Amerom, Inc.)				
	<i>[AhmedAllied 000646 - AhmedAllied 000653]</i>				
14.	2022 Ahmed W-2 Amerom, Inc.				
	<i>[AhmedAllied 000654]</i>				
15.	2021 Ahmed W-2 Amerom, Inc.				
	<i>[AhmedAllied 000655]</i>				

16.	2022 Ahmed's W-2 AUS				
	<i>[AhmedAllied 000627]</i>				
17.	Ahmed's Earning Statement with AUS				
	<i>[AUS 00682 - AUS 00695]</i>				
18.	Ahmed NEO Certificate				
	<i>[AUS 00663]</i>				
19.	Ahmed Training Certification - Preventing Unlawful Discrimination & Harassment				
	<i>[AUS 00664]</i>				
20.	Ahmed Security Professional ID Badge Receipt and Acknowledgment				
	<i>[AUS 00665]</i>				
21.	PATH Basis Course Certification Forms - Multiple Employees				
	<i>[AUS 00653- AUS 00654]</i>				
22.	Ahmed Weapon Issue/Return Form				
	<i>[AUS 00448- AUS 00449]</i>				
23.	Ahmed HEB Store Officer Training Checklist Form				
	<i>[AUS 00644 – AUS 00652]</i>				
24.	738 Bellaire Market Post Orders				
	<i>[AUS 00643]</i>				
25.	AUS Elite Officer PowerPoint				
	<i>[AUS 00940 – AUS 00955]</i>				
26.	AUS HEB Support Structure PowerPoint				

	<i>[AUS 00910 – AUS 00920]</i>				
27.	Proof of Completion of Use of Force Wallet Card				
	<i>[AUS 01002; AUS 00829]</i>				
28.	AUS Hot Sheet - All HEB Sites - General Post Orders				
	<i>[AUS 00638 – AUS 00642]</i>				
29.	AUS Hot Sheet - AUS Security Officer Post Orders				
	<i>[AUS 01036 – AUS 01042]</i>				
30.	PAN Form - Freeney Separation				
	<i>[AUS 001906 - AUS 001909]</i>				
31.	PAN Form - Ahmed Termination				
	<i>[AUS 00700 – AUS 00703]</i>				
32.	Email communication between Freeney and Hernandez regarding PAN for Ahmed on 4/14/2022				
	<i>[AUS 01078 – AUS 001082]</i>				
33.	TDPS Criminal History Search – Ahmed				
	<i>[AUS 00635 – AUS 00637]</i>				
34.	AUS Incident Report 4/4/2022 (written by Ahmed)				
	<i>[AUS 00671]</i>				
35.	Employee Statement 4/4/2022 (written by Ahmed)				
	<i>[AUS 00674]</i>				

36.	TDPS Employee Information Update Form (Ahmed)				
	<i>[AUS 01546]</i>				
37.	DHS Employment Eligibility Verification Form (Ahmed)				
	<i>[AUS 01558 – AUS 01561]</i>				
38.	Permanent Resident Card (Ahmed)				
	<i>[AUS 01562 – AUS 01563]</i>				
39.	EEOC Charge of Discrimination (Ahmed)				
	<i>[AUS 00001- AUS 00002]</i>				
40.	E-mails dated 6/3/2022 re: case information and paperwork for 36149, 36184				
	<i>[AUS 01252 – AUS 01253]</i>				
41.	AUS Job Description - Elite Security Professional - Armed				
	<i>[AUS 00629 – AUS 00631]</i>				
42.	AUS Job Description - General Manager				
	<i>[AUS 001805 – AUS 001808]</i>				
43.	AUS Job Description - Branch Manager				
	<i>[AUS 001809 – AUS 001812]</i>				
44.	AUS Job Description - Field Supervisor				
	<i>[AUS 001817 – AUS 001820]</i>				
45.	AUS Job Description - Regional Human Resources Manager				
	<i>[AUS 001821 – AUS 001824]</i>				
	AUS Job Description - Regional Human				

46	Resources Representative				
	<i>[AUS 001825 – AUS 001828]</i>				
47.	AUS Job Description - Human Resources Coordinator				
	<i>[AUS 001829 – AUS 001832]</i>				
48.	AUS Job Description - Client Manager				
	<i>[AUS 001813 – AUS 001816]</i>				
49.	AUS Job Description - Candidate Experience Specialist				
	<i>[AUS 001833 – AUS 001835]</i>				
50.	AUS job Description - Regional Trainer				
	<i>[AUS 001836 – AUS 001838]</i>				
51.	Root Cause Analysis - Version 1				
	<i>[AUS 00807 – AUS 00808]</i>				
52.	Root Cause Analysis - Version 2				
	<i>[AUS 01200 – AUS 01201]</i>				
53.	Use of Force and Reporting Policy; Use of Force Report Form (Handwritten)				
	<i>[AUS 00672 – AUS 00673]</i>				
54.	Use of Force and Reporting Policy; Use of Force Report Form (Typed - Version 1)				
	<i>[AUS 00968 – AUS 00971]</i>				
55.	Use of Force and Reporting Policy; Use of Force Report Form (Typed - Version 2)				
	<i>[AUS 00998 – AUS 01001]</i>				
	Hotline Complaint - Case No. 36184				

56.					
	<i>[AUS 00008 – AUS 00013]</i>				
57.	AUS Unacceptable Behavior Hot Sheet				
	<i>[AUS 00704 – AUS 00705]</i>				
58.	HEB Store Officer Training Checklist (Blank) - Version 1 (10 pages)				
	<i>[AUS 01023 – AUS 01032]</i>				
59.	HEB Store Officer Training Checklist (Blank) - Version 2 (9 pages)				
	<i>[AUS 00747 – AUS 00755]</i>				
60.	Incident Reporting and Response - Tab 07				
	<i>[AUS 00713 – AUS 00730]</i>				
61.	City of Bellaire CFS - Command Log				
	<i>[AhmedAllied000526 - AhmedAllied000536; AhmedAllied000539 - AhmedAllied000540]</i>				
62.	Text Messages Between MIC Kevin and Ahmed				
	<i>[AhmedAllied000594 - AhmedAllied000597]</i>				
63.	Court Records of Roberto E. Hernandez				
	<i>[AhmedAllied000551 - AhmedAllied000555]</i>				
64.	Photographs of Ahmed				
	<i>[AhmedAllied000590, AhmedAllied001804]</i>				
65.	Disciplinary Notice - 2/15/2022				
	<i>[AUS 00596; AUS 00668]</i>				
66.	Disciplinary Notice - 4/5/2022				

	<i>[AUS 00669; AUS 00670; AUS 01055]</i>				
67.	AUS Employee Handbook - All U.S. Locations				
	<i>[AhmedAllied000010, AhmedAllied000198]</i>				
68.	AUS New Employee Orientation				
	<i>[AUS 001615 - AUS 001802]</i>				
69.	AUS Human Resources Org Charts as of 10/2021				
	<i>[AUS 001839 - AUS 001882]</i>				
70.	AUS Diversity, Equity, and Inclusion Policy				
	<i>[AhmedAllied000255 -AhmedAllied000259]</i>				
71.	AUS North America Code of Ethics				
	<i>[AhmedAllied000230 - AhmedAllied000254]</i>				
72.	Ahmed's Job Applications for 2024				
	<i>[AhmedAllied000485 - AhmedAllied000487; AhmedAllied000620 - AhmedAllied000644]</i>				
73.	Ahmed's Letter to EEOC Investigator				
	<i>[AUS 00495 - AUS 00497]</i>				
74.	Ahmed's Counsel's communications with the EEOC Investigator				
	<i>[AUS 00509 - AUS 00510; AUS 00480 - AUS 00484]</i>				
75.	Ahmed's Electronically Signed Onboarding Documents				
	<i>[AUS 00554 - AUS 00595]</i>				
76.	Ahmed's Interview Schedule with AUS				

	<i>[AhmedAllied000481 -AhmedAllied000482]</i>				
77.	Ahmed's Contingent Job Offer with AUS				
	<i>[AhmedAllied000477 - AhmedAllied000478]</i>				
78.	Ahmed's Job Application with AUS				
	<i>[AhmedAllied000479 - AhmedAllied000480]</i>				
79.	Email communication between Ahmed and Alyea in May 25/26, 2022				
	<i>[AUS 01267]</i>				
80.	Internal Email Communication regarding Rehire Eligibility Status				
	<i>[AUS 01009]</i>				
81.	Email Communication between Felicia Solis-Ramirez and Bill King regarding SP's violation of UOF Policy				
	<i>[AUS 00972]</i>				
82.	Email communication between Alexzander Bergeron and Wayne Oliver regarding Ahmed's termination				
	<i>[AUS 01065]</i>				
83.	Email communication between Patrick Freney and Wayne Oliver on June 10, 2022 regarding Ahmed				
	<i>[AUS 01165 - AUS 01166]</i>				
84.	Email Communications Regarding Ahmed's Rehire Application to AUS				
	<i>[AUS 01220; AUS 01269 - AUS 01270]</i>				
85.	Photos of Patrick Freney				
	<i>[to be produced]</i>				

86.	Ahmed's Unemployment Application				
	[AUS 01272; AUS 01526]				
87.	Ahmed's Statement to Wayne Oliver on June 8, 2022				
	[AUS 01332 - AUS 01334]				
88.	Email Communications between Ahmed and Catherine Barnes in April 2022				
	[AhmedAllied000435 - AhmedAllied000436]				
89.	Internal Emails regarding Ahmed's violation of Use of Force Policy				
	[AUS 01402 - AUS 01403; AUS 00825 - AUS 00826; AUS 00842 - AUS 00844; AUS 00959 - AUS 00962]				

Date: May 2, 2025

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/s/ Jessica E. Chang

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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2025, I caused to be filed a true and correct copy of the foregoing document using the Court's CM/ECF system that will serve notice and a copy on all counsel of record as follows:

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